Outlook

RE: Haldar v. UND, et al

From Wermuth, Anna <awermuth@cozen.com>
Date Tue 11/12/2024 4:56 PM
To Naomi Shatz <nshatz@zalkindlaw.com>; Kindig, Kelly T. <KKindig@cozen.com>; Courtney E. Endwright <cendwright@betzadvocates.com>
Cc Palmer, Michael <Michael.Palmer@btlaw.com>; Niamh Gibbons <ngibbons@zalkindlaw.com>

Hi Naomi –

The request to allow ongoing breeding was raised by your client with the Court, and rejected. As you know, the mice were segregated before Dr. Haldar filed her lawsuit, and Dr. Haldar did not ask the Court for ***additional*** breeding mice – for her or for [redacted] – in her Motion. Moreover, these new requests for relief are directed only at [redacted] work, not Dr. Haldar's work. [redacted] is not a party to this case, and in any event, the Court already considered the potential harm to [redacted] in the order denying the Preliminary Injunction. Even so, such extraordinary relief is available ***to Dr. Haldar*** only if there is a strong likelihood of success of ***Dr. Haldar's claims***; the Court ruled that Dr. Haldar made no such showing on any of her claims.

The University has been ordered to pay for cryopreservation of mice specimen. Because animals are still being born and weaned, none are yet old enough to optimize cryopreservation. When I have an update, I can let you know.

In the meantime, for funding and research materials, [redacted] should reach out to [redacted]

Thanks,
Anna

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From: Naomi Shatz <nshatz@zalkindlaw.com>
Sent: Monday, November 11, 2024 11:49 AM
To: Wermuth, Anna <awermuth@cozen.com>; Kindig, Kelly T. <KKindig@cozen.com>; Courtney E. Endwright <cendwright@betzadvocates.com>
Cc: Palmer, Michael <Michael.Palmer@btlaw.com>; Niamh Gibbons <ngibbons@zalkindlaw.com>
Subject: Re: Haldar v. UND, et al

****EXTERNAL SENDER****

Anna,

I wanted to follow up on our conversation from Friday about what [redacted] planned experiments were to finish his PhD and his mouse-related needs for those experiments.

Currently, [redacted] is working on brain samples he took from mice they had a month or two ago. Dr. Haldar's lab also has one set of mice that are ready for experimentation, but they are waiting on information from their collaborators to determine which of the mice they can use for the experiments. [redacted] expects to receive this information this week and start on his next set of experiments.

[redacted] is currently engaged in two types of work: (1) pulse chase experiments where he injects the mice with a non-radiaoctive isotope and then follows them to see what part of metabolism is being affected by the therapies they are testing; and (2) dissections of the brains of the mice for testing. He also plans to do one gene therapy experiment.

For his work [redacted] needs to use mice that have certain genetic mutations. As things were at the time of last breeding, each time the mice are bred [redacted] receives a batch of about 30 mice. From each group of 30 mice, approximately 3 have the required genetic mutation (the ones without the mutation are also used in the experiments as control animals). For each of his experiments with the radiolabeled isotopes, [redacted] will need about 25-30 mice with the genetic mutation and an equal number of control mice. The mice must be 4-6 weeks old at the time that they are injected with the isotope.

When the breeding was stopped last month there were 14 female breeders. Since then, two have aged out of breeding. Six of the female breeders are between 22-25 weeks old, which is about the end of the breeding lifespan. [redacted] says they will need to add about 10 more breeding pairs to keep the colony at a production level that will support his experiments.

To finish his Ph.D., [redacted] plans to do at least 3 more pulse chase experiments, sequentially. Given the need for 25-30 mice with the correct mutation to start each experiment, he anticipates he will need approximately 300 mice bred for each experiment. He also plans to do one gene therapy experiment starting in January 2025, for which he will need about 40 mutant and 40 control mice (approximately 400 mice will need to be bred for this). For that experiment, he will carry out glycine measurements and brain pathologies on that set of mice to understand the speed of gene therapy one more experiment with about 40 mutants and 40 control mice to be initiated in January 2025. For this experiment he would carry out glycine measurements between January and March or April, then take brain pathologies of those mice.

His best estimate is that he can complete these experiments by about April 2025. In order to complete these experiments, he will need the mouse colony to be brought back to full breeding strength and kept breeding so that he has a sufficient supply of 4-6 week old mice with the correct mutations to start each experiment. He will also need funds for viral vectors, genotyping, glycine measurements, reagents, and brain pathologies as well as access to ND core facilities.

Once these experiments are completed, assuming he is not asked to perform any additional experiments by either his dissertation committee or the journals to which he has submitted the work for publication, he should no longer need the mouse colony.

Please let me know if there is additional information your client needs to understand [redacted] planned work and what is required if he is to have a shot at finishing his PhD next spring.

Best,
Naomi